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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

Chapter 11

LEHMAN BROTHERS HOLDING INC., et al.

Case No. 08-13555(JMP)

(Jointly Administered)

Debtors.

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**OBJECTION OF DISCOVERREADY LLC TO REVISED
CURE AMOUNT IN CONNECTION WITH ASSUMPTION
AND ASSIGNMENT OF EXECUTORY CONTRACTS**

DiscoverReady LLC (“DiscoverReady”) respectfully submits this objection to the Revised Cure Amount with respect to the executory contract between the Debtors and DiscoverReady. In support of this objection, DiscoverReady respectfully states as follows:

BACKGROUND

1. On September 15, 2008 (the “Petition Date”), Lehman Brothers Holdings Inc. (“LBHI”) commenced a case under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). On September 16, 2008, LB 745 LLC (“LB 745”, and collectively with LBHI the “Debtors”) commenced a case under Chapter 11 of the Bankruptcy Code. The Debtors continued to operate their business and manage their properties as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. On September 17, 2008, the Debtors' filed the Debtors' Motion to (A) Schedule a Sale Hearing; (B) Establish Sale Procedures; (C) Approve a Break-up Fee; and (D) Approve the Sale of the Purchased Assets and the Assumption and Assignment of Contracts Relating to the Purchased Assets (the "Sale Procedures Motion") including an Asset Purchase Agreement (the "Asset Purchase Agreement") that contemplates a sale of certain of the Debtors' assets to Barclays Capital, Inc. (the "Sale"). On September 19, 2008, the Court entered an order approving the Sale.

3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 ("SIPA") with respect to Lehman Brothers, Inc. ("LBI"). A trustee appointed under SIPA is administering LBI's estate.

4. On September 19, 2008 a schedule of executory contracts and unexpired leases that the Debtors planned to assume and assign to Barclays pursuant to the Asset Purchase Agreement was posted on the Debtors' case information website (the "Contract Schedules"). According to the Contract Schedules, LBI seeks to assume its contract with DiscoverReady with a cure amount of \$700,000.00 (the "Cure Amount").

5. On October 1, 2008, the Debtors' filed a revised schedule to Closing Date Contracts pursuant to which the Cure Amount for DiscoverReady was increased to \$914,966.37 ("Revised Cure Amount").

OBJECTION TO REVISED CURE AMOUNT

6. DiscoverReady is a party to a certain executory contract with LBI bearing contract number 0000045287USAUSD0001 (the "Contract"). Pursuant to the Contract, DiscoverReady performs E-Discovery services, document review, and hosting for litigation, regulatory and other legal matters.

7. DiscoverReady objects to the Revised Cure Amount proposed by the Debtors with respect to the Contract.

8. Based upon the review of DiscoverReady's books and records, the Debtors are obligated to pay the sum of \$2,199,638.38 in order to cure existing payment defaults on the Agreement ("Corrected Cure Amount").

9. Annexed hereto as Exhibit A is a schedule of all open invoices outstanding to DiscoverReady from the Debtors which comprise the Corrected Cure Amount.

10. The contact parties for DiscoverReady are Steven R. Harber, 212-699-3965 and C. Parkhill Mays III, 917-613-4670.

Dated: October 10, 2008
New York, NY

By: /s/ Robert Kolodney
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